



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

APR 25 2014

Mr. David P. Skipton, P.E.
Environmental Department Supervisor
Lincoln Electric System
1040 O Street
Lincoln, Nebraska 68501-0869

RE: Risk-Based Disposal Request for Low Pressure Oil Filled Cables at the Lincoln Airport, Nebraska

Dear Mr. Skipton:

The United States Environmental Protection Agency Region 7 has reviewed the March 11, 2014 Lincoln Electric System request to dispose low pressure oil filled electrical cables in place at the Lincoln Airport in Lincoln, Nebraska. The buried cables are believed to contain polychlorinated biphenyl compound contaminated oil, but are inaccessible for removal and disposal due to their burial in a subsurface vault running beneath active airport runways. Your request proposes to remove all above ground structures and dispose them in compliance with 40 CFR part 761, and to cap the ends of the cables until such time as property use allows them to be excavated and disposed.

The EPA has determined the proposed cleanup and on-site disposal will not pose an unreasonable risk of injury to human health or the environment and is approving the workplan with the following conditions:

1. LES shall complete a survey in support of obtaining an environmental covenant on that area of land underlain by the low pressure oil filled cables.
2. LES shall place near the four corners of the survey area survey markers and permanent signage identifying the presence of the buried low pressure oil filled cables potentially contaminated with PCBs, prohibiting drilling or excavation in the area, and providing contact information for LES and the EPA.
3. Any releases of PCBs to the environment encountered during or caused by the abandonment project shall be remediated and disposed in compliance with 40 CFR part 761.
4. LES shall submit a report to the EPA within 30 days of completion of the abandonment activities. This report shall document all activities performed in accordance with the approved plan and any deviations that may have occurred during implementation of the approved plan.
5. LES shall place a Uniform Environmental Covenant satisfactory to the EPA on the surveyed area including activity and use limitations previously proposed to LES by the EPA. This Uniform Environmental Covenant shall be completed in a timely manner, and an executed copy of the recorded covenant shall be provided to the EPA.



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6. At such time as access to excavate, test and dispose the low pressure oil filled cables is feasible due to changed use of the property, or any runway construction allowing such access, LES or its successors in interest will contact the EPA prior to initiation of such activities to ensure they are carried out in compliance with the Toxic Substances Control Act.

If you have any questions, please contact Kurt Limesand, of my staff, by phone at (913) 551-7184 or by email at limesand.kurt@epa.gov.

Sincerely,



Becky Weber
Director
Air and Waste Management Division

cc: Melissa Landis-McKibbon, LES
Jon L. Large, Lincoln Airport Authority
William Gidley, NDEQ